

**FILED**

FEB 01 2023

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CHRISTINE FLETCHER,**

**Defendant.**

Case No. **23 CR 036 GKF**

**INFORMATION**

**[COUNT ONE: 18 U.S.C. § 1344 –  
Bank Fraud;**

**COUNT TWO: 26 U.S.C. § 7201 –  
Tax Evasion;**

**Forfeiture Allegation: 18 U.S.C. §  
982(a)(2) – Fraud]**

**THE UNITED STATES ATTORNEY CHARGES:**

**COUNT ONE  
[18 U.S.C. § 1344]**

**The Scheme**

1. From at least December 2012 to in or about May 2021, in the Northern District of Oklahoma and elsewhere, the defendant, **CHRISTINE FLETCHER**, knowingly executed, and attempted to execute, a scheme and artifice to defraud financial institutions, and to obtain any of the moneys, funds, credits, assets, and other property owned by, and under the custody and control of, financial institutions, by means of material false and fraudulent pretenses, representations, and promises, as described below (“the Scheme”):

**The Purpose of the Scheme**

2. The purpose of the Scheme was to enrich **FLETCHER** unlawfully so that she might pay for a lifestyle that cost more than her legitimate income could afford.

**The Manner, Means, and Execution of the Scheme**

3. To achieve the purpose of the Scheme, **FLETCHER**, acted as an office manager and secretary for J.B., a person known to the United States Attorney, and various entities that J.B. owned or controlled, herein after referred to as “the Victims,” known to the United States Attorney. **FLETCHER**’s duties included office management, financial reporting, preparation of personal financial statements, and assistance with tax return preparation for the Victims. **FLETCHER** was employed by J.B. in various capacities, including being entrusted with these duties, for approximately 38 years until she was terminated in or about May 2021.

4. It was part of the Scheme that **FLETCHER** managed and otherwise had access rights for the Victims’ various bank accounts at BOKF, NA and accounts at Trust Company of Oklahoma.

5. It was part of the Scheme that **FLETCHER** prepared and provided financial statements and related information to the Victims’ tax return preparer, a person known to the United States Attorney, and with whom **FLETCHER** also used for her own personal tax preparation needs until tax year 2021.

6. It was part of the Scheme that, to avoid detection of her embezzlement activity, **FLETCHER** routinely made unauthorized transfers between and amongst various Victims’ accounts before misappropriating the funds for her own benefit. One of the many ways **FLETCHER** fraudulently moved money amongst the Victims’ accounts included making unauthorized transfers from various Victims’

accounts into D.B.'s bank account, a person known to the United States Attorney, and who was J.B.'s wife, who died on or around September 30, 2016.

7. It was part of the Scheme that, after fraudulently transferring money into D.B.'s bank account, **FLETCHER** prepared unauthorized checks, bearing D.B.'s forged signature made payable to herself or on **FLETCHER**'s behalf.

8. It was part of the Scheme that **FLETCHER** paid her own credit card account bills and other third parties for **FLETCHER**'s benefit with unauthorized and forged checks that she used to draw upon the Victims' accounts.

9. **FLETCHER** executed the Scheme by fraudulently causing unauthorized transactions and forged checks that caused a loss to the Victims in the approximate amount of \$2,188,870.00.

10. BOKF, NA is a "financial institution" within the meaning of Title 18, United States Code, Section 20, the depository accounts of which were insured by the Federal Deposit Insurance Corporation.

All in violation of Title 18, United States Code, Section 1344.

**COUNT TWO**  
**[26 U.S.C. § 7201]**

11. The allegations in paragraphs 1 through 10 of this Information are incorporated into this Count by reference.

12. From at least December 2012 to in or about May 2021, in the Northern District of Oklahoma and elsewhere, the defendant, **CHRISTINE FLETCHER**, a resident of Tulsa County, Oklahoma, willfully attempted to evade and defeat substantial income tax in the approximate amount of \$62,067.00, due and owing by her to the United States of America for the calendar year 2020, by committing the following affirmative acts, among others:

- a. **FLETCHER** routinely made unauthorized transfers between and amongst various Victims' bank accounts before misappropriating the funds for her own benefit in attempts to avoid detection of her embezzlement activity;
- b. After fraudulently transferring money into D.B.'s bank account, **FLETCHER** prepared unauthorized checks, bearing D.B.'s forged signature made payable to herself or on **FLETCHER's** behalf; and
- c. **FLETCHER** paid her own credit card account bills and other third parties for **FLETCHER's** benefit with unauthorized and forged checks that she used to draw upon the Victims' accounts.

All in violation of Title 26, United States Code, Section 7201.

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 982(a)(2)]**

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 982(a)(2).

Upon conviction of the offenses alleged in this Information, as a part of her sentence, the defendant, **CHRISTINE FLETCHER**, shall forfeit to the United States any property constituting, or derived from, or traceable to, the proceeds obtained, directly or indirectly, as a result of such violations. The property to be forfeited includes, but is not limited to:

**MONEY JUDGMENT**

1. A money judgment in an amount of at least \$2,188,870.00, representing proceeds obtained by **CHRISTINE FLETCHER** as a result of the offenses; and

**REAL PROPERTY**

2. All that lot and parcel of land, together with all buildings, appurtenances, improvements, fixtures, attachments and easements thereon, and all rights appertaining thereto, located at **12950 East 201 Street South**, Bixby, Tulsa County, Oklahoma, more particularly described as: LT 1, BLK 1, Section 16, Township 16, Range 14, BIXBY RANCH ESTATES, Tulsa County, Oklahoma, Tulsa County Assessor Parcel # 55867-64-16-00020.

Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Sections 982(b)(1) and 1028(g), and Title 28, United States Code, Section 2461(c), the defendant shall forfeit substitute property, up to the value

of the property described above if, by any act or omission of the defendant, the property described above, or any portion thereof, cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.

All pursuant to Title 18, United States Code, Section 982(a)(2).

CLINTON J. JOHNSON  
United States Attorney



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DAVID D. WHIPPLE  
Assistant United States Attorney